

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) PATRICIA THOMPSON, as Personal	)	
Representative of the Estate of	)	
MARCONIA LYNN KESSEE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. CIV-19-113-SLP
	)	
(1) NORMAN REGIONAL HOSPITAL	)	JURY TRIAL DEMANDED
AUTHORITY d/b/a NORMAN REGIONAL	)	
HOSPITAL, a public trust, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION AND  
BRIEF FOR PROTECTIVE ORDER**

This case relates to the death of Marconia Kessee (Decedent) on January 16, 2018 at the Norman Regional Hospital. Plaintiff has sued numerous Defendants, ranging from law enforcement personnel, jail staff, medical professionals, municipalities, correctional staff, and an elected official. To facilitate the free flow of discovery and for the protection of documents that any party designates as and reasonably believes to be “confidential material,” as defined by the proposed Agreed Protective Order, the parties believe a Protective Order is necessary. To this end, the parties have agreed to an Agreed Protective Order, which is being submitted by e-mail to the Court contemporaneously with this Motion, as a proposed Order. The parties respectfully request that the Court approve and enter it. The undersigned is authorized to submit this Motion jointly on behalf of all parties.

Respectfully submitted,

s/ Ambre C. Gooch

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2020, I electronically transmitted this filing to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

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